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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Kimberly Margaret Jimenez,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:20-cv-01808-DAD-GSA
STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 45-day extension of time, from August 29, 2022 to October 13, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Counsel for the Plaintiff is again out of State attending to an emergency with her ill father. (see

1 attached declaration). Additional time will be needed in light of limited access to
2 her computer and the recent assignment of this matter to undersigned Counsel.

3 In addition, Counsel has five merit briefs due the week of August 22, 2022
4 along with EAJA negotiations, and reply briefs.

5 Counsel requires additional time to brief the issues thoroughly for the
6 Court's consideration. Defendant does not oppose the requested extension.
7 Counsel apologizes to the Defendant and Court for any inconvenience this may
8 cause.

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10 Respectfully submitted,

11 Dated: August 18, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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13 By: /s/ Dolly M. Trompeter
14 DOLLY M. TROMPETER
15 Attorneys for Plaintiff

16
17 Dated: August 18, 2022

18 PHILLIP A. TALBERT
19 United States Attorney
20 PETER K. THOMPSON
21 Acting Regional Chief Counsel, Region IX
22 Social Security Administration

23 By: */s/ Caspar Chan
24 Caspar Chan
25 Special Assistant United States Attorney
26 Attorneys for Defendant
27 (*As authorized by email on August 18, 2022)
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ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: August 18, 2022

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE